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4 Attorney for Defendant  
5 SARAH A ROPATI

6 UNITED STATES DISTRICT COURT  
7 NORTHERN DISTRICT OF CALIFORNIA  
8 SAN FRANCISCO DIVISION

9 UNITED STATES OF AMERICA ) No. CR-07-00645-MMC  
10 )  
11 )

11 Plaintiff,

**EX PARTE APPLICATION TO PERMIT  
DEFENDANTS IN CUSTODY TO REVIEW  
DISCOVERY ON MP3 MACHINES;  
PROPOSED ORDERS**

12 )  
13 )  
14 RONALD WILLIAMS, et al, )  
15 )

15 Defendants.  
16 )  
17 )

17 Ian Loveseth, counsel for defendant Sarah A. Ropati, and CJA liaison counsel for all defendants  
18 and their counsel in this case, hereby applies for an Order permitting all in-custody defendants to  
19 review discovery on an MP3 machine. This application is based on the files and records in this  
20 case and the accompanying declaration of counsel.  
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22

23 DATED: March 10, 2008

/s/ Ian Loveseth  
IAN LOVESETH  
Counsel for Defendant  
SARAH A. ROPATI

**DECLARATION OF COUNSEL**

I, Ian Loveseth, declare as follows:

1. I am counsel for Sarah A. Ropati in Untied States vs. Ronald Williams, et al.,  
CR. 07-00645-MMC;

2. I am also liaison CJA counsel in this case;

3. I have been advised by Steven D. Moore, the discovery coordinator in this case, that  
the discovery consists of approximately 35,000 intercepted wiretap calls on eight (8) different  
target lines;

4. The defendants in this case must listen to and review the discovery and the most  
efficient way to provide them with these calls in to put them on MP3s;

5. Accordingly, declarant requests that two Court orders be signed permitting  
defendants at the Santa Rita Jail and at the Glen Dyer Detention Facility to listen to the discovery  
on MP3s.

I declare under penalty of perjury that the above is true and correct to the best of my  
knowledge. Executed in San Francisco on March 10, 2008.

/s/ Ian Loveseth  
IAN LOVESETH

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7 NORTHERN DISTRICT OF CALIFORNIA  
8 SAN FRANCISCO DIVISION

9 UNITED STATES OF AMERICA ) No. CR-07-00645-MMC  
10 )  
11 Plaintiff, ) [PROPOSED] ORDER PERMITTING  
12 ) DEFENDANTS TO USE MP3  
13 v. ) AUDIO PLAYERS TO REVIEW  
14 RONALD WILLIAMS, et.al., ) DISCOVERY AT SANTA RITA JAIL  
15 )  
16 Defendants. )  
The Honorable Maxine M. Chesney

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1 Finding good cause shown, as discovery has been provided in digital audio format:

2 IT IS HEREBY ORDERED that the following defendants be permitted to use an MP3  
3 player in order to review audio discovery at Santa Rita Jail;

4 BARRY LYNN SAMUEL,

5 ELEAZOR MORA-ARCIGA,

6 SALVADOR ORTEGA,

7 ERIKA MANZO,

8 JAVIER ULISES ZAMORA-HERNANDEZ,

9 ALFREDO GONZALEZ GOVEA,

10 CESAR RAMIREZ-CHAVIRA,

11 MIGUEL RAMIREZ.

12  
13 IT IS SO ORDERED.

14  
15 Dated: \_\_\_\_\_

16 THE HONORABLE MAXINE M. CHESNEY  
United States District Judge

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7 NORTHERN DISTRICT OF CALIFORNIA  
8 SAN FRANCISCO DIVISION

9 UNITED STATES OF AMERICA ) No. CR-07-00645-MMC  
10 )  
11 Plaintiff, ) [PROPOSED] ORDER PERMITTING  
12 ) DEFENDANTS TO USE MP3  
13 v. ) AUDIO PLAYERS TO REVIEW  
14 RONALD WILLIAMS, et.al., ) DISCOVERY AT GLENN DYER  
15 ) DETENTION FACILITY  
16 Defendants. )  
The Honorable Maxine M. Chesney

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1 Finding good cause shown, as discovery has been provided in digital audio format:

2 IT IS HEREBY ORDERED that the following defendants be permitted to use an MP3  
3 player in order to review audio discovery at Glenn Dyer Detention Facility, Oakland, CA (North  
4 County);

5 RONALD WILLIAMS,

6 JOSE JUAN PENALOZA-HILARIO,

7 SAMUEL ARANDA,

8 MICHAEL JOSEPH SILVA,

9 RONALD LEE HINES,

10 JOSE ANTONIO CAMACHO-MENDEZ,

11 EDWARD LEROY MOORE.

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13 IT IS SO ORDERED.

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15 Dated: \_\_\_\_\_

\_\_\_\_\_  
16 THE HONORABLE MAXINE M. CHESNEY  
United States District Judge